

AO 91 (Rev. 08/09) Criminal Complaint

SEALED**FILED**

UNITED STATES DISTRICT COURT

for the

Western District of Texas

FEB - 1 2017

CLERK, U.S. DISTRICT CLERK
WESTERN DISTRICT OF TEXASBY [Signature] DEPUTY

United States of America)

v.)

Case No. 5:17-MJ-113

CHRISTOPHER ALEXANDER REILLY)

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January, 2017 in the county of BEXAR in the
WESTERN District of TEXAS, the defendant(s) violated:*Code Section*
18 U.S.C. 2252A(a)(2)*Offense Description*
Receipt of Child PornographyPenalties: 5-20 years imprisonment;
Maximum fine \$250,000 fine;
Lifetime of supervised release;
\$100 Special Assessment;\$5,000 assessment pursuant to JVTA
Restitution and Forfeiture of items seized.

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.[Signature]*Complainant's signature*

James Thompson, Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 02/01/2017[Signature]*Judge's signature*City and state: SAN ANTONIO, TX

HENRY BEMPORAD, U.S. Magistrate Judge

Printed name and title

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, James Thompson, the affiant herein, being duly sworn, depose and say that:

1. I am a Special Agent ("SA") of the Federal Bureau of Investigation ("FBI") and have been so employed since November 2003. I am currently assigned to the San Antonio Division of the FBI. I am assigned to the Violent Crimes against Children Section and as such, I investigate crimes against children, including the trafficking and possession of child pornography. I have received particularized training in the investigation of computer-related crimes, peer-to-peer computer networking, and online (i.e. Internet based) crimes against children. I have conducted and been involved in numerous investigations of individuals suspected of producing, distributing and receiving child pornography and have participated in the execution of numerous search warrants which have resulted in the seizure of multiple items of child pornography. I have had the occasion to become directly involved in investigations relating to the sexual exploitation of children, to observe and review extensive examples of child pornography in various media formats, including computer-based formats. I have also received training in the investigation and detection of cases involving the sexual exploitation of children and child pornography.

2. The factual information supplied in this affidavit is based upon your Affiant's own investigation of this matter, as well as information provided by other law enforcement officers. Since this affidavit is submitted for the purpose of securing an arrest warrant, it does not include every fact known to the affiant concerning this investigation. The affiant has set forth facts that he believes establish probable cause to believe that Christopher Alexander Reilly, has violated the provisions of Title 18, U.S.C., Section 2252A – Receipt of Child Pornography.

3. On approximately 01/24/2016, 24HourData, a data recovery firm in the Dallas, Texas AOR, reported to Dallas FBI that their customer, Christopher Reilly, had submitted two 4TB hard drives by mail for data recovery. In the normal course of their business

attempting to recover data, the data recovery company routinely checks on the status of recovered files to ensure the file recovery is successful and they observed that the hard drives contained child pornography. Upon observing child pornography, the data recovery company stopped recovering data at that time and contacted Dallas FBI.

4. Dallas Task Force Officer Jeff Rich visited 24HourData on 01/25/2017 and observed the files observed by the repair technician at the recovery company. TFO Rich confirmed that they depicted children engaged in sexually explicit conduct. These files included a video depicting a young minor female child lying on her back completely nude and inserting a hairbrush in her vagina. TFO Rich confirmed that the data recovery company had received the drives from Reilly and have been instructed to mail recovered files to his home in San Antonio, Texas. TFO Rich subsequently obtained a search warrant to review the entire recovered files.

5. On 01/27/2017, your Affiant conducted a review of a selection of the files identified by Jeff Rich based on his search warrant, including the video file of the young female child inserting a hairbrush in her vagina and other videos depicting child pornography, including a file which is a 10 minute 34 second file depicting a prepubescent minor female child removing her clothes and inserting an object into her vagina. Your affiant also viewed a file which depicts a prepubescent minor female child nude from the waist down inserting an object into her anus.


6. On 1/31/17, FBI agents executed a federal search warrant at the home of Christopher Reilly in San Antonio, Texas. He was present and agreed to speak with agents. Reilly admitted downloading images depicting children engaged in sexually explicit conduct from the internet and to saving videos of such child pornography to an external hard drive. Reilly stated at the beginning of this year (2017) he obtained a new hard drive and "went a little crazy" and downloaded videos from the internet depicting children engaged in sexually explicit conduct and saved them onto his new hard drive. His hard drive failed and he sent the hard drive to a recovery service in Dallas. Reilly admitted viewing child pornography videos on the internet and stated he did so as recently as the previous night.

7. Reilly understands that child pornography is illegal. He denied every sexually

touching any minor children but admitted having a particular sexual interest in females 10 and older either posing sexually or engaged in sex acts with adults.

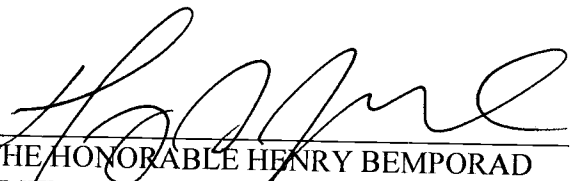
Application

8. Based on the aforementioned facts, your applicant respectfully submits that there is probable cause to believe that in January, 2017, CHRISTOPHER REILLY, knowingly received child pornography using any means and facility of interstate and foreign commerce, shipped and transported in and affecting interstate commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2). Your affiant respectfully requests that the Court issue an arrest warrant based on the information provided in this affidavit.



Special Agent James Thompson
Federal Bureau of Investigation

Sworn to and subscribed before me this 15th day of February 2017.



THE HONORABLE HENRY BEMPORAD
UNITED STATES MAGISTRATE JUDGE
WESTERN DISTRICT OF TEXAS